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Attorneys for Creditor-Lienholder
W. BRADLEY ELECTRIC, INC.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re

PG&E CORPORATION, INC,
Debtor in Possession.

Chapter 11

Case No. 19-30088 (DM)
(Lead Case)

In re

PACIFIC GAS AND ELECTRIC
COMPANY,
Debtor in Possession.

(Jointly Administered)

**THIRD NOTICE OF CONTINUED
PERFECTION OF MECHANICS
LIENS UNDER 11 U.S.C. § 546(b)(2)**

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric
Company
☐ Affects both Debtors
* All papers shall be filed in the Lead
Case, No. 19-30088 (DM)

BY THIS THIRD¹ NOTICE IS HEREBY GIVEN that W. BRADLEY ELECTRIC, INC. (“WBE”), is a party under a certain pre-petition contract with Pacific Gas and Electric Company (“PG&E”) and a subcontractor under certain pre-petition agreements with Roebbelen Contracting, Inc., which was or is a general contractor under certain related general contract agreements with PG&E (collectively, “WBE Contracts”), including but not limited to PG&E’s agreements with the respective referenced general contractors as specified in Schedule G in this case [Docket No. 907], as such subcontracts and general contracts may have been amended and

¹ Notices of continued perfection of mechanics liens were filed previously by the same creditor at Docket Nos. 1664 and 2586.

1 restated or otherwise modified or supplemented from time to time. Under the WBE Contracts,
2 WBE provided certain electrical, HVAC, sitework, interior upgrades and related services at
3 PG&E facilities and properties throughout Northern California (collectively, the “Properties”)
4 to the benefit of PG&E.

5 Pursuant to California Civil Code § 8460, an action to enforce a mechanics lien must be
6 commenced within 90 days after recordation of the claim of lien. However, due to the automatic
7 stay herein, WBE is precluded from filing a state court action to enforce its liens. Under 11
8 U.S.C. § 546(b)(2), when applicable law requires seizure of property or commencement of an
9 action to perfect, maintain or continue the perfection of an interest in property, and the property
10 has not been seized or an action has not been commenced before the bankruptcy petition date,
11 the claimant shall instead file a notice in bankruptcy court within the time fixed by law for
12 seizing the property or commencing an action. 11 U.S.C. § 546(b)(2); see also In re Baldwin
13 Builders, 232 B.R. 406, 410-411 (9th Cir. 1999); Village Nurseries v. Greenbaum, 101
14 Cal.App. 4th 26, 41 (2002).

15 Under California Civ. Code §§ 8050(a) and 8412, WBE is entitled to assert and hereby
16 does assert its lien rights and under 11 U.S.C. § 546(b) and gives this Notice in lieu of the
17 commencement of any action to perfect, maintain or continue WBE’s liens. WBE requests
18 adequate protection of said liens. True and correct copies of each of WBE’s mechanics liens,
19 recorded and filed against the Properties in each respective California county, are attached
20 hereto as **EXHIBIT A**, together with a summary of said liens. The outstanding amount due
21 under these two (2) lien projects currently totals not less than \$90,404.16 (altogether, the
22 “WBE Liens”).

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1 WHEREFORE, WBE asserts secured interests in the Properties as reflected by the WBE
2 Liens to the fullest extent allowed by applicable law, including interest and attorneys' fees.
3 Further, WBE reserves all rights to supplement and/or amend this Notice, and reserves any and
4 all other rights under applicable law.

5 DATED: November 26, 2019

LAW OFFICES OF JAMES SHEPHERD

6 By: /s/ James A. Shepherd

7 Attorney for Creditor-Lienholder
8 W. BRADLEY ELECTRIC, INC.
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